

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**GREGORY B. CRAIG,**

**Defendant.**

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**CRIMINAL NO. 19-CR-00125 (ABJ)**

**NOTICE OF FILING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully notes the filing of the government's discovery letters, attached hereto as Exhibit A.

Respectfully submitted,

JESSIE K. LIU  
UNITED STATES ATTORNEY  
D.C. Bar No. 472845

By: /s/ Fernando Campoamor-Sánchez  
FERNANDO CAMPOAMOR-SANCHEZ (DC 451210)  
MOLLY GASTON (VA 78506)  
Assistant United States Attorneys  
United States Attorney's Office  
555 4<sup>th</sup> Street NW  
Washington, D.C. 20530  
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Fernando.Campoamor-Sanchez@usdoj.gov  
Molly.Gaston@usdoj.gov

JOHN C. DEMERS  
ASSISTANT ATTORNEY GENERAL

By: /s/ Jason B.A. McCullough  
JASON B.A. MCCULLOUGH (DC 998006; NY 4544953)  
Trial Attorney  
Department of Justice

National Security Division  
950 Pennsylvania Ave NW  
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[Jason.McCullough@usdoj.gov](mailto:Jason.McCullough@usdoj.gov)

**Certificate of Service**

I certify that, by virtue of the Court's ECF system, a copy of the foregoing Notice of Filing has been sent to counsel for the defendant on August 11, 2019.

/s/ Fernando Campoamor-Sánchez

Fernando Campoamor-Sánchez  
Assistant United States Attorney





U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

June 7, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Email communication with [REDACTED] dated 5/28/2018 (USA-00021159 – USA-00021161);
- FD-302 Email communication with [REDACTED] (USA-00021162);
- [REDACTED] emails with attachments (USA-00021163 – USA-00021182);
- Metadata for all SAU documents produced by Skadden (USA-00021183);
- Chart reflecting Bates numbers from Skadden production that were produced twice;
- [REDACTED], [REDACTED], and [REDACTED] data sets (USA-REL-1022512 – 1031529). These are the documents that were returned after running the additional agreed upon search terms with the date limitation;
- FD-302s (USA-00021184-USA-00021349);
- FARA Registration Forms, exp. 2/28/14, (Blank) (USA-00021350-USA-00021374).



*District of Columbia*

June 17, 2019

By: /s/  
Fernando Campoamor Sánchez

Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

June 21, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Additional NSD Voluntary Production (USA-REL-1031530-1301926);
- Additional FARA Unit materials; letter & attached statutory supplement dated December 18, 2012(USA-00021397-00021421);
- Interview notes from 2017 9 26 [REDACTED] interview conducted by SCO (USA-00021422-00021439);
- FD-302 2017 9 26 [REDACTED] telephone call (USA-00021440-00021442);
- Agent notes from [REDACTED] telephone call (USA-00021443-00021446).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU  
United States Attorney

By:                     /s/                      
Fernando Campoamor Sánchez  
Molly Gaston



*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney*, National Security Division

Enclosures

*District of Columbia*

## Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
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July 3, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional FBI FD-302s (USA-00021614-USA-00021695).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU  
United States Attorney

By:                     /s/                      
Fernando Campoamor Sánchez  
Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

July 10, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Additional Podesta Documents (from previous date & time limitation search terms (USA-REL2-0178031-0183068);
- [REDACTED] notes from 2019 meeting with FTI (USA-00021696-00021705);
- [REDACTED] notes from 2019 meeting with FTI (USA-00021706-00021710);
- [REDACTED] interview notes & documents 2017 05 16 (USA-00021711-00021756);
- [REDACTED] interview documents 2018 05 17 (USA-00021757-00021794);
- [REDACTED] interview documents 2018 05 21 (USA-00021795-00021857);
- [REDACTED] attorney's FD-302, notes, documents 2018 06 12 (USA-00021858-00021869);
- FD-302 and agent notes of meeting with FARA Unit regarding hardcopy materials (USA-00021892-USA-00021894);
  - o FARA Unit hardcopy materials (USA-00021870-00021880);
  - o FARA Unit hardcopy materials (SENSITIVE) (USA-00021881-00021891);
- [REDACTED] interview notes & documents (USA-00021895-00021973);
- [REDACTED] interview notes & documents (USA-00021974-00021986);
- [REDACTED] 2018 05 31 interview documents (USA-00021987-00022053);
- [REDACTED] 2018 08 20 interview documents (USA-00022054-00022094);
- [REDACTED] emails 2012 12 14 and 2013 07 23 reproduced in color version (USA-00022095-USA-00022100).





U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
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July 17, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- [REDACTED] 2019 06 27 FD-302 & agent notes (USA-00022101-00022102);
- [REDACTED] 1 2019 06 06 FD-302 & agent notes (USA-00022103-00022148);
- [REDACTED] representative contacts 2019 07 11 FD-302 & agent notes (USA-00022149-00022150);
- [REDACTED] 2019 06 25 FD-302, agent notes & documents (USA-00022151-00022156);
- [REDACTED] 2019 06 14 FD-302 & agent notes (USA-00021757-00022212);
- Handwritten notes that appear on the back of the first page of the document that begins on SAU 281634 (USA-00022213);
- Map of Ukraine (USA-00022214);
- Map of Eastern & Central Europe (USA-00022215);
- Photographs of witnesses (USA-00022216-00022237);
- 2 Google maps of Ukraine (USA-00022238-00022239);
- Photographs of witnesses (USA-00022240-00022241).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,



*District of Columbia*

July 21, 2019

By: /s/  
 Fernando Campoamor Sánchez  
 Molly Gaston  
*Assistant United States Attorneys*  
 Jason B.A. McCullough  
*Trial Attorney, National Security Division*



Enclosures

*District of Columbia*

July 23, 2019

## Enclosures

*District of Columbia*

July 31, 2019

## Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

August 2, 2019

**Via File Transfer Portal**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- [REDACTED] 2019 07 12 FD-302 & agent notes (USA-00022386-USA-00022453);
- Tabs accompanying previously produced January 31, 2018 FD-302 of [REDACTED] (USA-00022454-00022854);
- [REDACTED] 2019 01 25 FD-302 (USA-00022855- USA-00022857);
- [REDACTED] 2019 01 15 FD-302 (USA-00022858- USA-00022872);
- [REDACTED] 2019 01 29 FD-302 (USA-00022873- USA-00022888);
- Various materials obtained from devices or accounts belonging to [REDACTED] (USA-00022889-USA-00023573);
- Notes of SA Daniel Kegl taken during recent trial preparation meetings (USA-00023574-USA-00225667);
- [REDACTED] 2019 01 28 FD-302 (USA-00023667-0023686);
- [REDACTED] 2019 02 08 FD-302 (USA-00023687-00023701);

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU

United States Attorney

By:                     /s/                      
Fernando Campoamor Sánchez  
Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

August 4, 2019

**Via USAfx**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed [REDACTED] interview documents with notations from SA Daniel Kegl (USA-00023702-00023806).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU  
United States Attorney

By:                     /s/                      
Fernando Campoamor Sánchez  
Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

Enclosures

*District of Columbia*

## Enclosures



U.S. Department of Justice

Jessie K. Liu  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

August 9, 2019

**Via USAfx**

William W. Taylor, III  
William J. Murphy  
Zuckerman Spaeder LLP  
1800 M Street NW, Suite 1000, North Tower  
Washington, DC 20036-5807

Re: *United States v. Gregory B. Craig*, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed SA Daniel Kegl's witness trial prep notes (USA-00023827-USA-00023832) and FD-302's (USA-00023833-00023853).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU  
United States Attorney

By:                     /s/                      
Fernando Campoamor Sánchez  
Molly Gaston  
*Assistant United States Attorneys*  
Jason B.A. McCullough  
*Trial Attorney, National Security Division*

Enclosures



*District of Columbia*

August 9, 2019

## Enclosures

*District of Columbia*

August 11, 2019

## Enclosures